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Attorneys for Defendants
 COUNTY OF SANTA CLARA, SANTA
 CLARA VALLEY MEDICAL CENTER,
 DR. OSBACK, SANTA CLARA
 COUNTY SHERIFF'S DEPARTMENT,
 SANTA CLARA COUNTY
 DEPARTMENT OF CORRECTIONS,
 SHERIFF DEPUTY VANDEGRAAF,
 SHERIFF DEPUTY ZUNIGA AND
 JANET LEASER

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA

E-FILED - 9/21/06

MARTIN LUTHER OREN, et al.,

Plaintiffs,

v.

COUNTY OF SANTA CLARA, et al.,

Defendants.

No. C0505100 RMW

**STIPULATION AND ~~PROPOSED~~ ORDER
 TO EXTEND DISCOVERY CUT-OFF DATE**

Plaintiff Martin Luther Oren and Defendants County of Santa Clara, Santa Clara Valley
 Medical Center, Dr. Osback, Santa Clara County Sheriff's Department, Santa Clara County
 Department of Corrections, Sheriff Deputy Vandegraaf, Sheriff Deputy Zuniga and Janet
 Leaser, by and through their counsel of record, hereby stipulate to and respectfully request an
 order continuing the discovery cut-off date from **October 6, 2006** to **October 27, 2006**.

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Stipulation and ~~Proposed~~ Order to Extend
 Discovery Cut-Off Date

This stipulation will not alter the following Court-imposed deadlines:

<u>Event</u>	<u>Date</u>
Disclosure of Experts	January 15, 2007
Expert Discovery Cut-off	February 2, 2007
Hearing on Dispositive Motions	March 16, 2007
Joint Pretrial Statement	April 6, 2007
Pretrial Conference	April 12, 2007
Jury Trial	May 7, 2007

IT IS SO STIPULATED.

Dated: 9/6/06

By:

Colleen Duffy Smith
COLLEEN DUFFY SMITH

Attorney for Plaintiff
MARTIN LUTHER OREN

Dated: 9/12/06

ANN MILLER RAVEL
County Counsel

By:

David M. Rollo
DAVID M. ROLLO
Deputy County Counsel

Attorneys for Defendants
COUNTY OF SANTA CLARA, SANTA
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COUNTY SHERIFF'S DEPARTMENT,
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DEPARTMENT OF CORRECTIONS,
SHERIFF DEPUTY VANDEGRAAF,
SHERIFF DEPUTY ZUNIGA AND
JANET LEASER

ORDER

Pursuant to the above-stated stipulation of the parties and good cause appearing,

IT IS SO ORDERED.

Dated: 9/21/06

/S/ RONALD M. WHYTE
HONORABLE RONALD M. WHYTE
United States District Court Judge

30152.wpd

Stipulation and ~~Proposed~~ Order to Extend
Discovery Cut-Off Date

ANN MILLER RAVEL
County Counsel
County of Santa Clara
San Jose, California

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